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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 RYON LENELL TRAVIS ,
a/k/a "Dontrez,"

Defendant.

Case:2:16-cr-20227

Judge: Friedman, Bernard A.

MJ: Grand, David R.

Filed: 03-31-2016 At 03:12 PM

INDI USA V RYON LENELL TRAVIS (LG)

VIO: 18 U.S.C. § 2251(a)
18 U.S.C. § 1591
18 U.S.C. § 2252A(a)(2)

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. A girl, Minor Victim One, whose identity is known to the Grand Jury, was the victim of the crimes alleged in Counts One, Two, and Three. Minor Victim One was a resident of the Eastern District of Michigan and was born in 2010.
2. A woman, Adult Victim One, whose identity is known to the Grand Jury, was the victim of the crime alleged in Count Four. Adult Victim One was a resident of the Eastern District of Michigan and was over the age of eighteen.

COUNT ONE

18 U.S.C. § 2251(a) — *Production of child pornography*

From on or about January 2015 to on or about March 2, 2016, in the Eastern District of Michigan, the defendant, RYON LENELL TRAVIS, did employ, use, persuade, induce, entice, and coerce Minor Victim One to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported and transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, and the visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in or affecting interstate and foreign commerce by any means, including by computer, and such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate and foreign commerce; all in violation of 18 U.S.C. § 2251(a).

COUNT TWO

18 U.S.C. § 2252A(a)(1) — *Transportation of child pornography*

On or about January 27, 2016, in the Eastern District of Michigan, the defendant, RYON LENELL TRAVIS, did knowingly transport child pornography, as defined in 18 U.S.C. § 2256(8)(A), using any means or facility of interstate or

foreign commerce and in and affecting interstate or foreign commerce by any means, including computer; all in violation of 18 U.S.C. § 2252A(a)(1).

COUNT THREE

18 U.S.C. § 2252A(a)(5)(B) — *Possession of child pornography*

On or about March 2, 2016, in the Eastern District of Michigan, the defendant, RYON LENELL TRAVIS, knowingly possessed any material that contained an image of child pornography, as defined in 18 U.S.C. § 2256(8)(A), and the child pornography included depictions of prepubescent minors who had not attained 12 years of age, and the child pornography had had been mailed, shipped, and transported using any means or facility of interstate or foreign commerce by any means, including by computer and the child pornography had been produced using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer; all in violation of 18 U.S.C. § 2252A(a)(5)(B).

COUNT FOUR

18 U.S.C. § 1591(a)(1) — *Sex trafficking by force, fraud, or coercion*

From on or about January 2014 to March 21, 2016, in the Eastern District of Michigan and elsewhere, the defendant, RYON LENELL TRAVIS, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, and solicited by any means Adult Victim One, knowing or in reckless

disregard for the fact that means of force, threats of force, fraud, coercion or any combination of such means would be used to cause Adult Victim One to engage in a commercial sex act; all in violation of 18 U.S.C. § 1591(a)(1).

FORFEITURE ALLEGATION

Upon conviction of the offense charged in Counts One through Four of the Indictment, the defendant, RYON LENELL TRAVIS, shall, pursuant to 18 U.S.C. §§ 2253 and 2428, forfeit to the United States the following:

- i. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections;
- ii. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- iii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

If any of the property described in the paragraphs above as being forfeitable pursuant to 18 U.S.C. §§ 2253 or 2428, as a result of any act or omission of the defendant —

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America, pursuant to 21 U.S.C. § 853(p), intends to seek forfeiture of all other property of the defendant up to the value of the above described forfeitable property.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

BARBARA L. McQUADE
United States Attorney

s/Matthew A. Roth
MATTHEW A. ROTH
Assistant United States Attorney
Chief, General Crimes Unit

s/Sara D. Woodward
SARA D. WOODWARD
Assistant United States Attorney
Deputy Chief, General Crimes Unit
211 West Fort Street, Ste. 2001
Detroit, MI 48226-3220
(313) 226-9180
sara.woodward@usdoj.gov

March 31, 2016

United States District Court
Eastern District of Michigan**Criminal Case Co**

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to cor

Reassignment/Recusal Information This matter was opened in the USAO prior to August 15, 2008 []

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: <i>SW</i>

Case Title: USA v. RYON LENELL TRAVISCounty where offense occurred : WAYNECheck One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**☐ Indictment/ ☐ Information --- no prior complaint.☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 16-30126]☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below]**Superseding Case Information**

Superseding to Case No: _____ Judge: _____

- ☐ Original case was terminated; no additional charges or defendants.
- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 31, 2016

Date

Sara D. Woodward

SARA D. WOODWARD

Deputy Chief, General Crimes Unit

Assistant U.S. Attorney

U.S. Attorney's Office, Eastern District of Michigan

211 W. Fort Street, Suite 2001

313-226-9180

sara.woodward@usdoj.gov

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.